

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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IN RE: WORLD TRADE CENTER
DISASTER SITE LITIGATION

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THIS DOCUMENT APPLIES TO ALL
WORLD TRADE CENTER DISASTER SITE
LITIGATION

Docket No.: 21 MC 100
21 MC 103 (AKH)

**NOTICE OF JOINT MOTION
TO VOLUNTARILY DISMISS**

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PLEASE TAKE NOTICE THAT upon the Declaration of Brian D. Crosby dated April 14, 2011, the exhibits annexed thereto, including a prior Order of this Court, the undersigned counsel will move this Court pursuant to Federal Rule of Civil Procedure 41(a)(2), hereby requesting that this Court:

1. grant the proposed Orders of Voluntary Dismissal annexed as **Exhibit “2” , Exhibit “3”, and Exhibit “4”**; and award
2. such other and additional relief as this Court deems just and proper.

Dated: New York, New York
 April 14, 2011

Respectfully submitted,

WORBY GRONER EDELMAN &
NAPOLI BERN, LLP
Plaintiffs' Co-Liaison Counsel



Brian D. Crosby (BC-9543)
350 5th Avenue, Suite 7413
New York, New York 10118
(212) 267-3700

To:

All attorneys of record in this matter in the Court's Electronic Case Filing System

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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IN RE: LOWER MANHATTAN
DISASTER SITE LITIGATION

-----X Docket No.: 21 MC 100
21 MC 103 (AKH)

THIS DOCUMENT APPLIES TO ALL
LOWER MANHATTAN DISASTER SITE
LITIGATION

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=====JOINT MOTION TO VOLUNTARILY DISMISS=====

=====WORBY GRONER EDELMAN & NAPOLI BERN, LLP=====

Attorneys for : Plaintiffs
350 5th Avenue, Ste. 7413
New York, New York 10118
(212) 267-3700

=====The undersigned attorney hereby certifies, pursuant to Fed. R. Civ. P. 11 that I have read the within papers and that to the best of my knowledge and belief they are factually correct and meritorious.



=====Attorney name: Brian D. Crosby (BC9543)

=====Service of a copy of the within
Dated, _____ is hereby admitted.

=====ATTORNEY(S) FOR

=====PLEASE TAKE NOTICE:

NOTICE OF ENTRY

that the within is a (certified) true copy of an _____ duly entered in the
office of the _____ clerk of the within named court on _____ 200____.

NOTICE OF SETTLEMENT

that an order _____ of which the within is a true copy, will be
presented for settlement to the HON. _____ one of the judges of the
within named Court, at _____ on _____ 200____ at _____ O'clock _____.M.

Dated, _____

Yours, etc.

=====WORBY GRONER EDELMAN & NAPOLI BERN LLP=====